

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|----------------------------|---|-------------------|
| ----- | X | |
| KALOMA CARDWELL, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| - against - | : | 1:19-cv-10256-GHW |
| | : | |
| DAVIS POLK & WARDWELL LLP, | : | |
| et al., | : | |
| | : | |
| Defendants. | : | |
| ----- | X | |

VERDICT SHEET

Please indicate each of your verdicts with a check mark (✓).

All jurors must agree on the answers to all of the questions.

Answer the following questions in order. Follow the instructions at the end of each question.

Retaliation—Section 1981 and New York State Human Rights Law

1. Has Mr. Cardwell proved, by a preponderance of the evidence, that Davis Polk & Wardwell LLP is liable for retaliation under Section 1981 and the New York State Human Rights Law?

Yes _____ No _____

Continue on to Question 2.

2. Has Mr. Cardwell proved, by a preponderance of the evidence, that Thomas Reid is liable for retaliation under Section 1981 and the New York State Human Rights Law?

Yes _____ No _____

Continue on to Question 3.

3. Has Mr. Cardwell proved, by a preponderance of the evidence, that John Bick is liable for retaliation under Section 1981 and the New York State Human Rights Law?

Yes _____ No _____

Continue on to Question 4.

4. Has Mr. Cardwell proved, by a preponderance of the evidence, that Daniel Brass is liable for retaliation under Section 1981 and the New York State Human Rights Law?

Yes _____ No _____

Continue on to Question 5.

Retaliation—Title VII

5. Has Mr. Cardwell proved, by a preponderance of the evidence, that Davis Polk & Wardwell LLP is liable for retaliation under Title VII of the Civil Rights Act of 1964?

Yes _____ No _____

If you answered “Yes” to Question 1, you must answer “Yes” to Question 5. If you answered “No” to Question 1, you must also answer “No” to Question 5.

Continue on to Question 6.

Retaliation—New York City Human Rights Law

6. Has Mr. Cardwell proved, by a preponderance of the evidence, that Davis Polk & Wardwell LLP is liable for retaliation under the New York City Human Rights Law?

Yes _____ No _____

Continue on to Question 7.

7. Has Mr. Cardwell proved, by a preponderance of the evidence, that Thomas Reid is liable for retaliation under the New York City Human Rights Law?

Yes _____ No _____

Continue on to Question 8.

8. Has Mr. Cardwell proved, by a preponderance of the evidence, that John Bick is liable for retaliation under the New York City Human Rights Law?

Yes _____ No _____

Continue on to Question 9.

9. Has Mr. Cardwell proved, by a preponderance of the evidence, that Daniel Brass is liable for retaliation under the New York City Human Rights Law?

Yes _____ No _____

If you answered “Yes” to any of Questions 1 to 9, please continue on to Question 10. If you answered “No” to all of the above questions, you have reached a verdict and need not respond to any other question in this verdict sheet. Please proceed to the last page of the verdict form.

Damages—Compensatory or Nominal Damages

10. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to compensatory or nominal damages from Davis Polk & Wardwell LLP?

Yes _____ No _____

You may answer “Yes” to Question 10 only if you answered “Yes” to Questions 1, 5, or 6. If you answered “No” to all three questions, you must answer “No” to Question 10.

- a. If “Yes,” in what amount?

\$ _____

Continue on to Question 11.

11. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to compensatory or nominal damages from Thomas Reid?

Yes _____ No _____

You may answer “Yes” to Question 11 only if you answered “Yes” to Questions 2 or 7. If you answered “No” to both questions, you must answer “No” to Question 11.

- a. If “Yes,” in what amount?

\$ _____

Continue on to Question 12.

12. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to compensatory or nominal damages from John Bick?

Yes _____ No _____

You may answer “Yes” to Question 12 only if you answered “Yes” to Questions 3 or 8. If you answered “No” to both questions, you must answer “No” to Question 12.

- a. If “Yes,” in what amount?

\$ _____

Continue on to Question 13.

13. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to compensatory or nominal damages from Daniel Brass?

Yes _____

No _____

You may answer "Yes" to Question 13 only if you answered "Yes" to Questions 4 or 9. If you answered "No" to both questions, you must answer "No" to Question 13.

a. If "Yes," in what amount?

\$ _____

Continue on to Question 14.

Damages—~~Nominal~~Punitive Damages

14. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to ~~nominal~~punitive damages from Davis Polk & Wardwell LLP?

Yes _____ No _____

You may answer "Yes" to Question 14 only if you answered "Yes" to ~~Questions 4,~~Question 5 or ~~6~~Question 10. If you answered "No" to ~~all three~~both questions, you must answer "No" to Question 14.

a. ~~If "Yes," in what amount?~~

\$ _____

Continue on to Question 15.

15. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to ~~nominal~~punitive damages from Thomas Reid?

Yes _____ No _____

You may answer "Yes" to Question 15 only if you answered "Yes" to ~~Questions 2 or 7~~Question 11. If you answered "No" to ~~both questions~~Question 11, you must answer "No" to Question 15.

a. ~~If "Yes," in what amount?~~

\$ _____

Continue on to Question 16.

16. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to ~~nominal~~punitive damages from John Bick?

Yes _____ No _____

You may answer "Yes" to Question 16 only if you answered "Yes" to ~~Questions 3 or 8~~Question 12. If you answered "No" to ~~both questions~~Question 12, you must answer "No" to Question 16.

a. ~~If "Yes," in what amount?~~

\$ _____

Continue on to Question 17.

17. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to ~~nominal~~punitive damages from Daniel Brass?

Yes _____ No _____

You may answer "Yes" to Question 17 only if you answered "Yes" to ~~Questions 4 or 9~~ Question 13. If you answered "No" to ~~both questions~~ Question 13, you must answer "No" to Question 17.

a. ~~If "Yes," in what amount?~~

\$ _____

~~Continue on to Question 18.~~

~~**Damages—Punitive Damages**~~

~~18. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to punitive damages from Davis Polk & Wardwell LLP?~~

~~Yes _____~~

~~No _____~~

~~*You may answer “Yes” to Question 18 only if you answered “Yes” to Questions 1, 5 or 6. If you answered “No” to all three questions, you must answer “No” to Question 18.*~~

~~*Continue on to Question 16.*~~

~~19. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to punitive damages from Thomas Reid?~~

~~Yes _____~~

~~No _____~~

~~*You may answer “Yes” to Question 19 only if you answered “Yes” to Questions 2 or 7. If you answered “No” to both questions, you must answer “No” to Question 19.*~~

~~*Continue on to Question 17.*~~

~~20. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to punitive damages from John Bick?~~

~~Yes _____~~

~~No _____~~

~~*You may answer “Yes” to Question 20 only if you answered “Yes” to Questions 3 or 8. If you answered “No” to both questions, you must answer “No” to Question 20.*~~

~~*Continue on to Question 18.*~~

~~21. Has Mr. Cardwell proved, by a preponderance of the evidence, that he is entitled to punitive damages from Daniel Brass?~~

~~Yes _____~~

~~No _____~~

~~*You may answer “Yes” to Question 21 only if you answered “Yes” to Questions 4 or 9. If you answered “No” to both questions, you must answer “No” to Question 21.*~~

~~*Please proceed to the next page.*~~

After the Jury has reached unanimous agreement on all the questions and completed the form, the foreperson should date and sign the verdict form, place it in a sealed envelope marked "Verdict," and hand it to the marshal.

Signature of Foreperson

Dated: _____